

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

JOHN C. KITCHIN, JR., et al.,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

VS.

BRIDGETON LANDFILL, LLC, et al.,

Defendants.

Case No. 4:18-cv-00672-CDP

## **DEFENDANTS' MOTION FOR SEALING**

Defendant and Third-Party Plaintiff Bridgeton Landfill, LLC and Defendant Republic Services, Inc. (collectively “Defendants”) hereby move the Court to seal Defendants’ Motion to Disqualify James Clayborne and the Law Firm of Clayborne & Wagner LLP in Their Representation of Plaintiffs. The information discussed in Defendants’ Motion to Disqualify contains references to privileged attorney-client communications and attorney work product, and such communications and attorney work product are the very subject of the Motion to Disqualify. Therefore, the Motion to Disqualify should be sealed, and Defendants request that the Motion to Disqualify remains sealed indefinitely due to its privileged and confidential nature.

Dated: June 8, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 8, 2022 a true and correct copy of the foregoing was served on all counsel of record via electronic mail.

/s/ Allyson E. Cunningham  
An attorney for Defendants and Third-Party Plaintiff